

April 6, 2023

The Honorable Ur M. Jaddou  
Director  
U.S. Citizenship and Immigration Services  
5900 Capital Gateway Drive  
Camp Springs, MD 20746

The Honorable Julie A. Su  
Acting Secretary  
U.S. Department of Labor  
200 Constitution Avenue, NW  
Washington, DC 20210

Dear Director Jaddou and Acting Secretary Su:

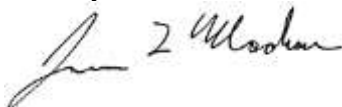
On behalf of the physician and medical student members of the American Medical Association (AMA), I am writing to urge the U.S. Citizenship and Immigration Services in coordination with the Department of Labor to allow for more flexibility, during public health emergencies, in the worksite requirements governing where international medical graduates (IMG) in H-1B status can practice.

Non-U.S. citizen IMGs play a critical role in providing health care to many Americans, especially in areas of the country with higher rates of poverty and chronic disease. Nearly 21 million people live in areas of the U.S. where foreign-trained physicians account for at least half of all physicians.<sup>1</sup> These areas of the country also had lower vaccination rates during the COVID-19 pandemic, higher hospitalization rates, and higher death rates.<sup>2</sup> Unfortunately, these communities were unable to fully utilize their IMG physician workforce to combat COVID-19 due to worksite requirements that restrict IMGs in H-1B status to a particular practice location. Any work outside the strict limits of the H-1B location condition application (LCA) is a violation of the physician's H-1B status. In situations where an employer needs an IMG who possesses H-1B status to work at additional locations, the employer is required to file an amended LCA, which can be time-consuming and costly. In normal times, these requirements are meant to protect the jobs of native-born physicians and provide additional protections for H-1B physicians. During the pandemic, however, these requirements have hindered communities' ability to respond effectively to hotspots.

Moreover, due to the restrictions associated with LCAs, IMG physicians were unable to utilize temporary expedited physicians licensing, preventing them from helping combat workforce shortages during the public health emergency, and providing urgent access to medical care for underserved patient populations. Therefore, **we urge the Administration to allow temporary provisions for H-1B LCAs to make worksite requirements more flexible for IMG physicians during public health emergencies and support expedited licensing inclusions for IMG physicians in H-1B status during public health emergencies.**

If you have any questions, please contact Margaret Garikes, Vice President for Federal Affairs, at [margaret.garikes@ama-assn.org](mailto:margaret.garikes@ama-assn.org), or by calling 202-789-7409.

Sincerely,



James L. Madara, MD

<sup>1</sup> <https://www.americanimmigrationcouncil.org/sites/default/files/research/foreign-trained-doctors-are-critical-to-serving-many-us-communities.pdf>

<sup>2</sup> COVID-19 and rural communities: Protecting rural lives and health. McKinsey and Company, March 2021